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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

JIMMY PETERSON, individually, and as  
Guardian ad Litem for CHARLOTTE-MARIE-  
SMITH-PETERSON, a minor,

Plaintiffs,

v.

TELICIA DA'SHANE HALL, an individual;  
NEW PRIME, INC., a Foreign Corporation; and  
DOES I through X, inclusive

Defendants.

CASE NO:

**DEFENDANT NEW PRIME, INC.'S STATEMENT CONCERNING REMOVAL**

COMES NOW Defendant NEW PRIME, INC. and provides the following Statement  
Concerning Removal:

1. The dates on which you were served with a copy of the Complaint in the removed  
action: Defendant NEW PRIME, INC. received a copy of the Complaint via personal service on  
June 30, 2017. Upon information and belief, Defendant TELICIA DA'SHANE HALL has not  
yet been properly served with the Summons and Complaint.

2. The dates on which you were served with a copy of the Summons: Defendant NEW PRIME, INC. was served with a copy of the Summons on June 30, 2017.

3. In removals based on diversity jurisdiction, the names of any served defendants who are citizens of Nevada, the citizenship of the other parties and a summary of defendant's evidence of the amount in controversy: The removal of this action is based on diversity jurisdiction. Upon information and belief, Plaintiffs JIMMY PETERSON and CHARLOTTE-MARIE SMITH-PETERSON are and remain citizens of the State of Nevada. Upon information and belief, Defendant TELICIA DA'SHANEE HALL is and remains a citizen of the State of Missouri. Defendant NEW PRIME, INC. is a Nebraska corporation.

In addition, Defendant removed this action based on its belief that the amount in controversy, exclusive of interest and costs, exceeds \$75,000.00. Plaintiffs have alleged that they sustained personal injuries, including "disability, mental and physical pain and suffering, disfigurement, loss of enjoyment of life, hedonic damages and loss of household services." Plaintiffs further allege that they have incurred medical bills and expenses. Plaintiff JIMMY PETERSON further alleges that he has sustained and may in the future sustain "loss of income and/or impairment of earning capacity, the exact amount to be determined at the time of trial." See e.g., Plaintiff's Complaint at ¶¶ X, XI and XII.

4. If your notice of removal was filed more than thirty (30) days after you first received a copy of the summons and complaint, the reason removal has taken place at this time and the date you first received a paper identifying the basis of removal: Not applicable. The Notice of Removal was filed within thirty (30) days after Defendant first received a copy of the Summons and Complaint.

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1           5.       In actions removed on the basis of the Court's jurisdiction in which the action in  
 2 state court was commenced more than one year before the date of removal, the reasons this  
 3 action should not summarily be remanded to the state court. Not applicable. The Notice of  
 4 Removal was not filed more than one year after the state court action was commenced.  
 5 Plaintiff's original Complaint was filed in the Eighth Judicial District Court for Clark County,  
 6 Nevada, on June 27, 2017.

7           6.       The name of any defendant known to have been served before you filed the notice  
 8 of removal who did not formally join in the notice of removal and the reasons they did not: Not  
 9 applicable. Upon information and belief, Defendant NEW PRIME, INC. is the only Defendant  
 10 who has been served with the Summons and Complaint.

11           Dated this 6th day of July, 2017.

12                           ALVERSON, TAYLOR  
 13                           MORTENSEN & SANDERS

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15                           J. BRUCE ALVERSON, ESQ.  
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 22                           702-385-7000 Fax  
 23                           Attorneys for Defendants  
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**CERTIFICATE OF ELECTRONIC SERVICE**

I certify that on the 6th day of July, 2017, service of the above and foregoing  
**DEFENDANT NEW PRIME, INC.'S STATEMENT CONCERNING REMOVAL** was  
made by electronically filing a true and correct copy of the same to each party addressed as  
follows:

Steven M. Burris, Esq.

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Samuel B. Benham, Esq.

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Employee of ALVERSON, TAYLOR  
MORTENSEN & SANDERS

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